



## **PROGRESS REPORT NO. 158**

**TO:** Robert Tan, U.S. Environmental Protection Agency (EPA) – via Email  
Kathryn Cerise, EPA – via Email

**FROM:** Kris McCaig, Teck American Incorporated (TAI)

**Cc:** Denise Mills, TAI – via Email  
Monica Tonel, EPA – via Email

**DATE:** September 10, 2019

**FILE NO:** 01-773180-000

**RE:** Upper Columbia River (UCR) Remedial Investigation/Feasibility Study  
(RI/FS) - Progress Report No. 158 Month Ending August 2019

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Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES) – TAI continued coordination with the SATES team and Kira Lynch, Superfund Technology Liaison with the Office of Research and Development, Office of Science and Policy during the month. TAI continued coordinating with Ohio State University (OSU) laboratory to perform bench-scale testing of the selected soil amendments. OSU received the municipal biosolids for the bench tests on August 19, 2019, and previously received the other four amendments selected for bench-scale testing. OSU prepared the test pots for the bench tests and expects to begin the testing in early September 2019.

On August 7, 2019, TAI submitted a response to an inquiry that we received via email on August 5, 2019 from a member of the public about the use and testing of biosolids as a soil treatment medium.

### **Baseline Ecological Risk Assessment:**

Soil Toxicity Reference Values (TRVs) – TAI received a letter from EPA on August 19, 2019 with comments on the Draft Technical Memorandum “Soil Screening Levels for Plants and Invertebrates for the Baseline Ecological Risk Assessment” dated June 25, 2019. TAI worked on revisions to the technical memorandum in response to these

comments and will submit the Draft Final Technical Memorandum to EPA by September 19, 2019.

TAI continued working on analyses for Steps 1 through 5 (“Characterize Site Metals Concentrations Relative to Both Eco-SSLs and Background Concentrations”), as outlined in the memorandum titled “Final Approach for Evaluating the Potential for Metals Toxicity to Plants and Invertebrates in the Baseline Ecological Risk Assessment (May 2019).”

Sediment and Porewater TRVs – TAI and EPA held a Sediment and Porewater TRV workshop in Spokane on March 5-6, 2019 to work through EPA’s comments on the October 2019 draft final TRV document. Follow up actions continued during the month of August.

Data Review – TAI received a Technical Memorandum from EPA on August 8, 2019, titled “Data Verification and Validation of USGS Supplied Materials in Accordance with the Quality Assurance Project Plan for the Phase 2 Sediment Study, Teck American Incorporated, March 2013 – Final”.

Chemicals of Potential Concern (COPC) Refinement Document – TAI submitted the Final COPC Refinement Document to EPA on August 9, 2019.

Upland Soil Background Assessment – TAI received a letter from EPA on August 19, 2019 with comments on the draft Technical Memorandum “Assessment of Background Concentrations of Metals and Metalloids in Upland Soils” dated June 28, 2019 and began revising the technical memorandum.

2018 Phase 3 Sediment Study Sediment Facies Mapping – TAI worked on the quality assurance quality control review of the data collected during the sediment facies mapping field work that was completed between July 8 and July 18, 2019.

2019 Phase 3 Sediment Study – TAI delivered a Notice of Dispute to EPA on August 1, 2019 regarding EPA’s July 10, 2019 comments on the draft Quality Assurance Project Plan (QAPP) for the 2019 Phase 3 Sediment Study. TAI submitted the draft final QAPP to EPA on August 2, 2019. TAI received a letter from EPA in August 12, 2019 with response to TAI’s dispute letter. TAI received a letter from EPA on August 15, 2019 with comments on the draft final QAPP. TAI delivered a letter to EPA on August 20, 2019, providing responses to EPA’s comments on the draft final QAPP. The letter also included a list of revisions to specific elements in the draft final QAPP based on agreement to include two judgmental sampling locations in the China Bend Area of Interest and information provided by EPA with a list of their chosen split samples for bulk sediment and porewater chemistry. TAI received a conditional approval letter from EPA on August 22, 2019 indicating EPA’s acceptance of TAI’s responses to the August 15 comments and some requested editorial changes to the August 2, 2019 version of the draft final QAPP. TAI submitted the final QAPP to EPA on August 27, 2019 and a separate letter in response to

EPA's letter dated August 12, 2019 regarding the informal dispute; this letter indicated that TAI representatives and contractors signed the final QAPP under protest.

TAI received EPA's draft split sample QAPP via email on August 15, 2019. TAI reviewed the draft QAPP and submitted comments to EPA via email on August 23, 2019. EPA provided the revised draft split sample QAPP to TAI for review via email on August 29, 2019. TAI reviewed the revised QAPP and responded on August 30, 2019 with a comment that did not require further revision to the split sample QAPP.

TAI submitted a preliminary field sampling schedule via email to EPA on August 26, 2019, and participated on a conference call with EPA the same day to discuss the schedule for planning and coordination purposes.

TAI submitted a Special Use Permit application to the National Park Service on August 27, 2019, which is required to conduct sampling activities in the China Bend and Evans AOIs. At the time of writing, TAI obtained the fully executed SUP from NPS on September 9, 2019.

TAI submitted a request for permission to Natural Resources Canada on August 27, 2019, which is required for the 2019 Phase 3 field sampling activities at the reference locations in Canada. EPA also submitted a request for permission to Natural Resources Canada on August 27, 2019, for EPA to take splits of samples TAI collects in Canada.

TAI submitted a notification by email to the Washington State Department of Natural Resources on August 30, 2019, providing notification of the 2019 field sampling activities. DNR acknowledged the notification that same day.

Human Health Risk Assessment (HHRA) – TAI submitted comments via email on August 2, 2019 concerning some quantification discrepancies in the Final Data Analysis Report (DAR) for the Recreational Use Survey. TAI submitted a Technical Memorandum with comments on the Final DAR for the Recreational Use Survey to EPA on August 22, 2019.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.